

Exhibit 3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

LOUIS VUITTON MALLETIER,)	
S.A.,)	
)	
Plaintiff,)	
)	
vs.)	Case No.
)	14-cv-3419 (JMF)
MY OTHER BAG, INC.,)	
)	
Defendant.)	
_____)	

VIDEOTAPED DEPOSITION OF TARA MARTIN
LOS ANGELES, CALIFORNIA
THURSDAY, NOVEMBER 20, 2014

DEBORAH MORIN

Certified Shorthand Reporter
in and for the State of California
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1 testimony. Compound.

2 BY MR. SHAPIRO:

3 Q Please go ahead.

4 A Yes. The bags that I have chosen are very
5 specific so that the joke is completely there and makes
6 sense.

7 Q Right. And the joke is that you have a
8 distinctive, recognizable and exclusive bag, and that
9 makes it a joke on the bag that you are carrying, which
10 is the My Other Bag; correct?

11 MR. KENT: Objection. Mischaracterizes prior
12 testimony.

13 THE WITNESS: The joke is that, you know, you
14 have My Other Bag, and every spoof is taking something
15 iconic and recognizable and well known and, you know,
16 we're doing a parody of that.

17 BY MR. SHAPIRO:

18 Q And the parody is that My Other Bag, the tote
19 bag you're carrying is being made fun of; is that right?

20 A No. My Other Bag is the parody.

21 Q I see. Now, why did you put the designer bag
22 on the other side?

23 MR. KENT: Objection. Vague and ambiguous.
24 You can answer.

25 THE WITNESS: That was the whole point of the

DEBORAH MANZO-VASQUEZ

1 company, My Other Bag. It says it right there in the
2 name. My Other Bag is, you know, one of these just like
3 my other car is.

4 BY MR. SHAPIRO:

5 Q The "my other car" is a bumper sticker that
6 you put not on a jaguar; right?

7 A No. You put it on the other car.

8 Q Why do you do that?

9 A That's the whole parody.

10 Q So you're making fun of the car that says "my
11 other car is a Jaguar"?

12 A You're not making fun of -- yes, I mean --

13 Q Let's go on.

14 Now, did you purposely choose bags that were
15 fashionable?

16 A I choose bags that were recognizable.

17 Q Well, do you regard your bags as fashionable?

18 A Not necessarily. They're a parody.

19 Q Have you described your bags as fashionable?

20 A I think they are stylish for a tote bag.

21 Q But you wouldn't use the word "fashionable"?

22 A Might.

23 Q Do you think your bags are fashionable?

24 MR. KENT: Objection. Asked and answered.

25 You can answer the question again.

DEBORAH MANZO-VASQUEZ

1 Q Because of the lawsuit?

2 MR. KENT: Counsel, when you finish the line
3 of inquiry or find a time for a break --

4 MR. SHAPIRO: Oh, sure. Any time you need a
5 break is fine with me. Let me just sort of finish this
6 line.

7 Q You don't like Louis Vuitton anymore; right?

8 A You've made it a little hard.

9 Q Because of the lawsuit?

10 A Yes.

11 Q Okay. Well, let's just take it up to the time
12 of the lawsuit. You loved Louis Vuitton bags until
13 Louis Vuitton began to have a quarrel with you; is that
14 correct?

15 A Yes.

16 Q When you say you loved them, what do you mean
17 by that?

18 A I loved the bags.

19 Q Have you ever disparaged the bags?

20 A Disparaged? Do you mind --

21 Q Well, have you ever negatively criticized the
22 bags before the lawsuit came about?

23 A Not that I can recall.

24 Q And did you have any reason ever -- well, did
25 you ever do anything to negatively criticize the bags or

1 criticize them in any way?

2 MR. KENT: Objection. Vague and ambiguous.

3 THE WITNESS: Negatively, no.

4 BY MR. SHAPIRO:

5 Q Positively in saying that you love them?

6 A I have said that I love designer bags, yes.

7 Q Well, let's make certain we're clear. Have
8 you ever criticized Louis Vuitton bags up to the time of
9 the lawsuit?

10 MR. KENT: Objection. Vague and ambiguous.

11 THE WITNESS: Not that I can recall.

12 BY MR. SHAPIRO:

13 Q And certainly by starting My Other Bag, you
14 weren't doing anything that you regarded as criticizing
15 Louis Vuitton, were you?

16 MR. KENT: Objection. Vague and ambiguous.

17 THE WITNESS: I mean it was a parody of Louis
18 Vuitton.

19 BY MR. SHAPIRO:

20 Q That wasn't my question. I wasn't asking
21 about parody. I was asking whether you were criticizing
22 Louis Vuitton.

23 MR. KENT: Same objection.

24 THE WITNESS: I wouldn't say criticizing, no.

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